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July 29, 2020

Via ECF

Hon. Lewis J. Liman **United States District Court** Southern District of New York 500 Pearl Street, Room 701 New York, NY 10007 (212) 805-0226 LimanNYSDChambers@nysd.uscourts.gov

Re: Convergen Energy LLC et al. v. Brooks et al.

Dear Judge Liman:

On behalf of Plaintiffs in the above-referenced action, we write to notify the Court that, contrary to the Spanish Defendants' July 28, 2020 letter (Dkt. 100), defendant Daniel Garcia Escandon ("Escandon") was in fact served on July 22, 2020 (see Dkt. 101). This undermines the Spanish Defendants' request for an extension to respond to the complaint.

Respectfully,

/s/Michael Stolper

Michael Stolper, Esq.

Defense counsel via ECF cc: